

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

John O. Desmond

12/01/2016 Allowed.

In re:)	
)	
JAMES F. MCAULIFFE,)	CHAPTER 7
)	CASE NO. 16-11089-MSH
Debtor.)	
)	
JOHN O. DESMOND, CHAPTER 7)	
TRUSTEE FOR THE ESTATE OF)	
JAMES F. MCAULIFFE)	
)	
Plaintiff,)	ADVERSARY PROCEEDING
)	NO. 16-01164-MSH
v.)	
)	
ROBIN S. GILBERT,)	
)	
Defendant.)	
)	

**JOINT MOTION TO APPROVE EXTENSION OF DISCOVERY DEADLINE AND
PROPOSED DISCOVERY PLAN AND RULE 26(f) CERTIFICATION**

Plaintiff John O. Desmond, Chapter 7 Trustee for the Estate of James F. McAuliffe and defendant Robin S. Gilbert hereby ask that this Court approve the extension of the discovery deadline and the [Proposed] Discovery Plan and Rule 26(f) Certification, filed herewith. This discovery plan constitutes a change from that set forth in the Court's Pretrial Order dated October 31, 2016. The changes were precipitated largely to accommodate anticipated fact discovery and the addition of expert-related deadlines into the discovery schedule.

In support of this Motion, the Parties state as follows:

1. On March 28, 2016 (the "Petition Date"), the Debtor filed a voluntary petition pursuant to Chapter 7 of the Bankruptcy Code.